1 STUART F. DELERY Assistant Attorney General ELIZABETH J. SHAPIRO 2 Deputy Branch Director 3 Federal Programs Branch KATHRYN C. DAVIS (DC Bar #985055) 4 Trial Attorney Federal Programs Branch U.S. Department of Justice, Civil Division 5 20 Massachusetts Avenue, N.W., Room 6130 Washington, DC 20530 6 Tel.: (202)616-8298 7 Fax: (202)616-8460 Email: Kathryn.C.Davis@usdoj.gov 8 Counsel for Defendants 9 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 10 OAKLAND DIVISION 11 ELECTRONIC FRONTIER FOUNDATION. 12 Case No.: 4:09-cv-03351-SBA Plaintiff, 13 **Stipulation** 14 v. No hearing requested 15 CENTRAL INTELLIGENCE AGENCY, et al., 16 Defendants. 17 18 The parties to this action, through their undersigned counsel, have conferred and have reached an agreement with respect to a partial modification of the current deadlines, as set forth 19 20 in the Court's Order of February 19, 2014 [ECF No. 86], to comply with the Court's Order of September 30, 2013 [ECF No. 81]. 21 Pursuant to this stipulation, the parties agree to partial modification of the current 22 23 deadlines to comply with the Court's Order of September 30, 2013, as follows: 1. Defendant the Department of Defense shall release to Plaintiff the information 24 25 that the Court has not determined was properly withheld or serve Plaintiff with a satisfactory 26 supplemental *Vaughn* index and declaration by no later than March 25, 2014. 27 28

1	2. Defendant the Department of Justice, specifically its component the Federal
2	Bureau of Investigation, shall release to Plaintiff the information that the Court has not
3	determined was properly withheld or serve Plaintiff with a satisfactory supplemental Vaughn
4	index and declaration by no later than April 4, 2014.
5	3. In the event the parties are unable to resolve their disputes regarding any withhele
6	information, the parties must submit the stipulation required by the Court's Order of September
7	30, 2013, by no later than May 5, 2014.
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9	Dated: March 20, 2014 Respectfully submitted,
10	/s/ Kathryn C. Davis
11	KATHRÝN C. DAVIS (DC Bar #985055) Counsel for Defendants
12	/a/ Ionnifon I vu al
13	/s/ Jennifer Lynch JENNIFER LYNCH (SBN 240701) Counsel for Plaintiff
14	Counsel for Flainliff
15	DECLARATION PURSUANT TO L.R. 5.1
16	I, Kathryn C. Davis, hereby declare that I have obtained Jennifer Lynch's concurrence in the
17	filing of this document.
18	Executed at Washington, D.C. this 20th day of March, 2014.
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22	PURSUANT TO STIPULATION, IT IS SO ORDERED.
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24	Dated: The Honorable SAUNDRA B. ARMSTRONG
25	United States District Judge
26	
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CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2014, I electronically filed the foregoing document with the Clerk of the Court, using the CM/ECF system, which will send notification of such filing to the counsel of record in this matter who are registered on the CM/ECF system.

/s/ Kathryn C. Davis

KATHRYN C. DAVIS